

Stephanie A. Hambrick, WSB #, 6-2785
Assistant United States Attorney
District of Wyoming
P.O. Box 22211
Casper, WY 82602
(307) 261-5434
stephanie.hambrick@usdoj.gov



**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 0:21-mj-57-NDF-1

**GREGORY MICHAEL SAMUEL
TOTH,**

Defendant.

MOTION FOR DETENTION HEARING

The United States moves for pretrial detention of the Defendant, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves the following:

**Serious risk Defendant will flee
Serious risk obstruction of justice**

2. Reason for Detention. The court should detain the Defendant because there are no conditions of release which will reasonably assure:

**Defendant's appearance as required
Safety of any other person and the community**

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against the Defendant under § 3142(e).

4. Time for Detention Hearing. The United States requests the Court conduct the detention hearing:

After a continuance of three days

DATED this 4th day of October 2021.

L. ROBERT MURRAY
Acting United States Attorney

By: 
STEPHANIE A. HAMBRICK
Assistant United States Attorney